



USDA Forest Service
Santa Fe National Forest
Comexico Mineral Exploration FAQs

1. What is Comexico proposing to do?

Comexico's plan of operations is to conduct short-term exploratory drilling on a total area of 5-7 acres on the Pecos/Las Vegas Ranger District of the Santa Fe National Forest (SFNF). The company plans to use existing infrastructure – roads and drill sites – from earlier mineral exploration to drill no more than 30 core holes to analyze previously identified mineral deposits.

2. Where exactly is the site Comexico plans to drill?

Comexico's focus is on the Jones Hill and Macho Canyon areas in the upper Pecos Valley, about 3.5 miles southwest of the historic Pecos Mine, which was active from 1881 to 1939. Located in Santa Fe County within the Pecos River watershed in the Sangre de Cristo Mountains, the project area is south and west of Tererro, New Mexico (NM). The project area is on National Forest System land, but must be accessed through private property and land managed by NM Game and Fish.

3. Will this exploratory drilling project turn into full-blown mining?

It's too early to tell. The answer to that question depends on what minerals Comexico finds, the market price for those minerals, and how much it would cost to extract them. If a mining company cannot make a profit, it's not going to mine. The same area saw a great deal of exploratory drilling from the 1970s through the 1990s, but none of those companies pursued mining. It's also worth noting that Comexico is not a mining company. Its business model is to conduct exploration on previously identified deposits and market the prospect to other investors/companies for development.

4. What is Comexico looking for?

The primary minerals Comexico is looking for are copper, lead, zinc, silver and gold.

5. Why is the Forest Service allowing Comexico to drill on the Santa Fe National Forest?

The General Mining Law of 1872 (as amended) grants individuals and corporations the right to prospect for and develop mineral deposits on federal lands. Comexico is asserting the right to prospect, and U.S. laws and regulations entitle the company to conduct operations to explore for locatable minerals on its mining claims. Federal mining laws and regulations require the Forest Service to allow mineral exploration and development on National Forest System lands. While the Forest Service does not have the authority to prohibit the exploration and development of mineral resources, it can require Comexico to implement specific measures to protect resources.

6. Has Comexico started drilling?

No. In April 2019, Comexico requested access to Forest Service roads that are closed to the public to stake its mining claims and conduct minor surface sample collection and geophysical testing. Since these activities are non-surface disturbing and do not require National Environmental Policy Act (NEPA) analysis, the SFNF gave Comexico a list of measures to protect plants, wildlife and cultural resources and allowed the activities to proceed. Drilling operations cannot commence until the SFNF has completed its NEPA analysis and the New Mexico Energy, Minerals and Natural Resources Department's Division of Mining and Minerals has issued Comexico a state permit.

7. Is the Forest Service listening to public concerns about the possibility of a mining operation in the upper Pecos Valley?

The SFNF is very mindful of the environmental legacy of earlier mining activities in this area, including soil and water contamination that required remediation. When Comexico initially approached the Forest Service and the New Mexico Energy, Minerals and Natural Resources Department with its proposed plan of operations, the SFNF issued a press release to let the public know. Recognizing the cultural

significance of the larger landscape surrounding the project site to several federally recognized pueblos and tribal nations, the SFNF is also engaged in ongoing tribal consultation and has briefed the congressional delegation. The scoping period from December 2, 2019, through January 17, 2020, gives other stakeholders and members of the public the opportunity to [submit substantive comments](#) on the proposal, all of which will be reviewed and analyzed as part of the SFNF's environmental analysis under the NEPA.

8. How is this project going to impact all the things the public and local officials are worried about: drinking water, traffic, home values, tourism, and recreation (including hunting and fishing)?

The Comexico project is a small-scale exploratory drilling project that will use existing roads and drill sites to drill no more than 30 holes on an area that cumulatively totals 5-7 acres. It is highly unlikely that the core drilling will impact any of the values named in the question. However, if information obtained during scoping indicates otherwise, the Forest Service will impose additional mitigation measures on Comexico to protect natural and cultural resources that may be at risk. Any future mining operations or expanded exploratory activities would trigger new NEPA analysis.

9. Why isn't the Forest Service preparing an Environmental Impact Statement for the Comexico project?

There are three different levels of analysis under NEPA:

- Categorical Exclusion (CE)
- Environmental Assessment (EA)
- Environmental Impact Statement (EIS).

Federal agencies can use CEs for specific actions that have a large body of previous environmental analysis and consistent findings that they do not individually or cumulatively have a significant effect on the human environment. Based on the expected degree of disturbance, the Comexico exploratory drilling proposal fits under an established CE described in 36 CFR 220.6(e)(8): "Short-term (1 year or less) mineral, energy, or geophysical investigations and their incidental support activities that may require cross-country travel by vehicles and equipment, construction of less than 1 mile of low standard road, or use and minor repair of existing roads." If scoping reveals uncertainty over the significance of cumulative effects or points to the need for an EA or EIS, the SFNF will conduct further environmental analysis and documentation.

10. Has the SFNF started NEPA analysis for this project?

The scoping period for the Comexico project started Monday, December 2, 2019, and will conclude on January 17, 2020. Public comments submitted during scoping help the SFNF determine the scope of the project, including mitigation measures that may be required to limit the environmental impact of the exploratory drilling on wildlife, plants, soils, water and cultural resources. Comments can be submitted [electronically](#) through the Forest Service's Comment and Analysis Response Application (CARA), by sending email to comments-southwestern-santafe-pecos-lasvegas@fs.fed.us with "Comexico Proposal" in the subject line, by sending postal mail to Santa Fe National Forest, Pecos/Las Vegas District, P.O. Drawer 429, Pecos, NM 87552, or by hand-delivering comments to the Pecos/Las Vegas Ranger Station at 32 South Main Street in Pecos, NM, between 8:00 am and 4:30 pm.

11. Is Comexico going to be building new roads to access the site and pouring new concrete drill sites?

No new roads or drill sites will be constructed for Comexico's proposed project. The truck-mounted drill rig will stay on existing roads. The drill rigs do not require any concrete pads.

12. Will Comexico's drilling project require water, and if so, where is it going to come from?

The estimated amount of water needed for exploratory drilling operations is less than 3 acre feet or about 977,500 gallons. To put that in perspective, an Olympic-sized swimming pool holds 660,250 gallons, so Comexico will use the equivalent of 1.5 Olympic pools. The existing water well on the site dates from earlier exploration efforts and is currently permitted to the SFNF by the Office of the State Engineer (OSE) for livestock use. Comexico will apply to the OSE to temporarily change the permitted use to minerals production for one year. Water storage tanks adjacent to the well will be used to truck water to the active drill rig.

13. How can members of the public monitor Comexico's activities?

Although the project area is on National Forest System lands, there is no public access to the area. The site must be accessed through private property and land managed by the NM Department of Game and Fish. The Forest Service does not have easement rights, and Comexico negotiated separately with landowners to get access to the Jones Hill site. The roads on National Forest System land are for administrative use only and have been closed to motorized use by the public since the SFNF implemented its travel management plan. Forest managers understand the high level of public interest in Comexico's operation and may be able to arrange a field trip for interested members of the public.

14. In addition to the General Mining Law of 1872, are there other laws that might impact the Comexico project?

Other federal laws relevant to the Comexico project include the:

- Endangered Species Act. The project area is within critical habitat for the threatened Mexican spotted owl and the endangered Holy Ghost ipomopsis. Other species that may be impacted include the northern goshawk, peregrine falcon and Rio Grande cutthroat trout. One of the SFNF's mitigation measures is to limit drilling operations to outside the breeding season for the Mexican spotted owl.
- National Historic Preservation Act. Although this section of the Pecos Valley does not have a high number of identified cultural sites, it is culturally significant to several federally recognized pueblos and tribal nations. The SFNF has met individually and collectively with tribal governments as part of the tribal consultation process and will continue to do so through the project. The SFNF will facilitate tribal access to traditional cultural properties and traditional uses during operations.
- Clean Water Act. The project area is in the Upper Pecos Watershed and less than 2 miles away from the Santa Fe Municipal Watershed. As the historic Pecos Mine in the same vicinity demonstrated, the ores, waste rocks, and byproducts (tailings) of the volcanogenic massive sulfide deposit have the potential to generate sulfuric acid when exposed to oxygen and water, commonly called acid mine drainage. The acid mobilizes the metals within the rocks and causes water and soil pollution problems over the long term. Mitigation measures to avoid these issues would be included in any future mining proposals.
- Wilderness Act. The project area is adjacent to the Pecos Wilderness. Although the Wilderness Act allows mining activities within wilderness where valid mining claims already exist, it also requires that those activities be conducted in "a manner compatible with the preservation of the wilderness environment."